

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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WILLIAM FRIMPONG,

Plaintiff,

-against-

1199SEIU, UNITED HEALTHCARE
WORKERS EAST

Defendants.
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Case No. 07 CV 7375 (JGK)

ECF CASE

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, Rule 56.1 Statement of Material Facts Not in Dispute, and Affidavits of Aida Morales and Suzanne Metzger Defendant 1199SEIU United Healthcare Workers East ("1199SEIU" or "Union"), by its undersigned attorney, shall move, at a date to be set by this Court, for an Order dismissing the present Complaint pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure ("Fed.R.Civ.P.") and/or for summary judgment pursuant to Fed. R.Civ.P. 56 and for such other relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE, that, pursuant to S.D.N.Y. Local Civil Rule 6.1(b), opposing papers, if any, are to be served on or before October 29, 2007, and reply papers, if any, are to be served on or before November 5, 2007.

Dated: October 15, 2007
New York, New York

_____/s/
By: David Slutsky (DS-7364)
Counsel for Union Defendants
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TO: Arlen S. Yalkut
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